

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

UNITED STATES OF AMERICA)	Crim. No. <u>9:21-cr-853</u>
)	
)	18 U.S.C. § 2
)	18 U.S.C. § 371
)	18 U.S.C. § 922(a)(1)(A)
v.)	18 U.S.C. § 922(a)(6)
)	18 U.S.C. § 923(a)
)	18 U.S.C. § 924(a)(1)(D)
)	18 U.S.C. § 924(a)(2)
)	18 U.S.C. § 924(d)(1)
)	28 U.S.C. § 2461(c)
)	
EDWIN CARL HAMILTON)	INDICTMENT
CRUZ J. ROMERO-ROMERO)	

COUNT 1
(Conspiracy)

THE GRAND JURY CHARGES:

Beginning in or about October 2019, and continuing to in or about February 2020, in the District of South Carolina, the Defendants, **EDWIN CARL HAMILTON** and **CRUZ J. ROMERO-ROMERO**, knowingly and intentionally conspired and agreed together and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, namely to engage in knowingly making false statements to a federal firearm license, in violation of Title 18, United States Code, Section 922(a)(6), and at least one of the Defendants committed an overt act to effect the object of the conspiracy, namely the straw purchase of firearms alleged in Counts 2 through 10 of this Indictment, which are incorporated by reference;

A violation of Title 18, United States Code, Section 371.

COUNTS 2-9
(Knowingly Making a False Statement with Firearm Purchase)

THE GRAND JURY FURTHER CHARGES:

That on or about the date reflected below, in the District of South Carolina, the Defendant, **EDWIN CARL HAMILTON**, aided and abetted by Defendant, **CRUZ J. ROMERO-ROMERO**, did knowingly make a false statement in connection with the acquisition and attempted acquisition of the firearm listed below from the licensed dealer listed below, which was intended and likely to deceive the said dealer with respect to a fact material to the lawfulness of the sale and disposition of the firearm under the provisions of Chapter 44 of Title 18, United States Code, in that the Defendant, **EDWIN CARL HAMILTON**, did execute a Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the true purchaser of the firearm listed below, whereas in truth and in fact, he was not the true purchaser;

COUNT	DATE	FIREARM	LICENSED DEALER
2	10/8/2019	Ruger, LCP .380 pistol	Palmetto State Outfitters, LLC
3	12/19/2019	PSA, Model PA-15, Multi caliber lower receiver	Palmetto State Outfitter, LLC
4	12/19/2019	PSA, Model, PA-15 Multi caliber lower receiver	Palmetto State Outfitters, LLC
5	12/30/2019	FNH, Model FNX-45, .45 caliber pistol	Palmetto State Outfitters, LLC

6	1/23/2020	FN, Model 5.7, .57 caliber pistol	Palmetto State Outfitters, LLC
7	2/3/2020	SCCY, Model CPX-1, 9mm pistol	Palmetto State Outfitters, LLC
8	2/21/2020	CMMG, Model MK57, .57 caliber pistol	Top Dollar Pawn Shop III
9	2/21/2020	Ruger, Model Ruger-57, .57 caliber pistol	Palmetto State Outfitters, LLC

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

COUNT 10
(Dealing in Firearms without a License)

THE GRAND JURY CHARGES:

From in or about June 2009 to in or about August 2021, in the District of South Carolina, the Defendant, **EDWIN CARL HAMILTON**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

FORFEITURE**FIREARM OFFENSES:**

Upon conviction for felony violation of Title 18, United States Code, Section 922 as charged in this Indictment, the Defendants, **EDWIN CARL HAMILTON** and **CRUZ J. ROMERO-ROMERO**, shall forfeit to the United States all of the Defendants' rights, title and interest in and to,

- (a) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) involved in or used in any knowing violation of 18 U.S.C. § 922, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Indictment includes, but is not limited to, the following:

A. **Firearms:**

1. Springfield Armory, model XDS-9, 9mm pistol
Serial Number: S3749407
2. Ruger, model Ruger-57, 5.7x28mm pistol
Serial Number: 641-12909
3. Pioneer Arms, model Hellpup, 7.62x39mm pistol
Serial Number: PACI 126762
4. Fostech, model Lite, multi caliber pistol
Serial Number: FT00010620
5. Palmetto State Armory (PSA), model AKV, 9mm pistol
Serial Number: AKV007920
6. GSG, model GSG-AK47, .22 caliber rifle
Serial Number: A736602

7. Colt, model Super 38 Auto, .38 super caliber pistol
Serial Number: 2941420
8. PSA rifle
Serial Number: AKES000507
9. Walther model P22, .22 caliber pistol
Serial Number: Z064469
10. CMMG, model MK57 Banshee, 5.7x28mm pistol
Serial Number: BFT03371

B. Ammunition:

Assorted rounds of ammunition

Pursuant to Title 18, United States Code, 924(d)(1) and Title 28, United States Code,
Section 2461(c).

A True BILL

FOREPERSON

M. Rhett DeHart
M. RHETT DEHART (JCH)
ACTING UNITED STATES ATTORNEY